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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD, and DENOVIA
MACK, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-cv-03131-JCS

**STIPULATION AND ~~[PROPOSED]~~ ORDER
TO SUSPEND CASE DEADLINES AND
SCHEDULE A STATUS CONFERENCE**

STIPULATION

Pursuant to Civil Local Rule 6-2, Plaintiffs Brayden Stark, Judd Oostyen, Isaac Belenkiy, Valerie Burton, Laura Goodfield, and Denovias Mack (“Plaintiffs”) and Defendant Patreon, Inc. (“Patreon”) jointly stipulate as follows:

WHEREAS, the parties mediated before the Honorable Jeremy D. Fogel (Ret.) on June 27, 2023, November 20, 2023, March 5, 2024, and April 16, 2024;

WHEREAS, the parties have reached an agreement in principle on terms to resolve this action;

WHEREAS, the parties require additional time to prepare and execute a formal settlement agreement that embodies their agreement in principle;

WHEREAS, on April 14, 2023, the Court entered a scheduling order setting July 10, 2024, as the close of fact discovery (Dkt. No. 65);

WHEREAS, on February 12 and March 5, 2024, the Court entered orders setting: (1) an April 29, 2024 deadline for Plaintiffs to file their motion for class certification; (2) a June 12, 2024 deadline for Patreon to file its opposition; (3) a July 10, 2024 deadline for Plaintiffs to file their reply; (4) a hearing on Plaintiffs’ motion for class certification on August 16, 2024; and (5) additional deadlines governing the designation of experts and expert discovery (Dkt. Nos. 124, 138);

WHEREAS, in view of the impending case deadlines, the parties wish to conserve judicial and party resources and focus their efforts to finalizing the settlement of this action;

WHEREAS, the parties anticipate that within 60 days they will have executed a final settlement agreement and Plaintiffs will be prepared to file their motion for preliminary approval of the settlement.

NOW THEREFORE, subject to the Court’s approval, the parties hereby stipulate and agree to, and respectfully request that the Court enter an order suspending all case deadlines (*see* Dkt. Nos. 65, 124, and 138), setting a status conference for May 29, 2024, or as soon thereafter as is convenient for the Court, and establishing June 28, 2024 (or another appropriate date) as the deadline by which the parties will have executed a final settlement agreement and Plaintiffs will submit their motion for preliminary approval of the settlement. A proposed Order granting the foregoing relief appears beneath the signature blocks.

IT IS SO STIPULATED.

1 Dated: April 29, 2024

Respectfully submitted,

2 By: /s/ Simon S. Grille

3 Adam E. Polk (SBN 273000)

4 Simon S. Grille (SBN 294914)

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11 *Counsel for Plaintiffs*

12
13 Dated: April 29, 2024

By: /s/ Nathan Walker

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ATTESTATION

I, Simon Grille, am the ECF User whose ID and password are being used to file this document.
In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

Dated: April 29, 2024

/s/ Simon Grille

Simon Grille

[PROPOSED] ORDER

PURSUANT TO STIPULATION, THE COURT ORDERS AS FOLLOWS:

All existing case deadlines are VACATED. The parties will execute a final settlement agreement and Plaintiffs will submit their motion for preliminary approval of the settlement by June 28, 2024. **The Court sets a Status Conference for May 31, 2024, at 2:00 PM by Zoom Webinar. Zoom Webinar ID: 161 926 0804. Passcode: 050855.**

IT IS SO ORDERED AS MODIFIED.

Dated: April 30, 2024

By: 

Honorable Joseph C. Spero

United States Magistrate Judge